

Exhibit 5



1099 14TH ST. NW
8TH FLOOR WEST
WASHINGTON, DC 20005
(202) 640-2850
WWW.KAISERDILLON.COM

evoshell@kaiserdillon.com

May 8, 2020

Dear Bill,

Thank you for providing the affidavit in support of the search warrant. I write to request additional information about the affidavit pursuant to Rule 16 and *Brady v. Maryland*, 373 U.S. 83 (1963). The requested discovery is necessary in order for Mr. Sanders to evaluate the legality of the warrant.

Specifically, I request that the government provide answers to the following questions and relevant documents, if any exist:

1. Did the foreign law enforcement agency ("FLA") provide any information that a user with IP address [REDACTED] "accessed" the target website on any occasions other than on May 23, 2019? Please provide any documentation related to this question.
2. Did the FLA provide any documentation to demonstrate that a user with IP address [REDACTED] "accessed" the target website on May 23, 2019 and/or any other date? If so, please provide all relevant documentation.
3. In what form did the FLA provide the FBI with information that a user with IP address [REDACTED] "accessed" the target website on May 23, 2019? If the FLA provided written information to the FBI, please provide all relevant documents related to that written information.
4. Please identify the FBI agent(s) who interacted with the FLA regarding the information provided in August 2019.
5. Please explain what is meant by the term "accessed" in paragraph 23 of the affidavit in support of the application for the search warrant.
6. How did the FLA determine that a user with IP address [REDACTED] "accessed" the target website on May 23, 2019? Please provide all relevant documents related to this question.

7. What, if anything, did the FBI do to confirm that the FLA was in fact able to determine that a user with IP address [REDACTED] “accessed” the target website on May 23, 2019?
8. What specific “online child sexual abuse and exploitation material” did a user with IP address [REDACTED] “access” through the target website on May 23, 2019? Please provide all relevant documents pertaining to this issue.
9. How was the FLA able to determine that a user with IP address [REDACTED] “accessed” “online child sexual abuse and exploitation material,” as opposed to the website more generally, on May 23, 2019? Please provide all relevant documents pertaining to this question.
10. Did the FLA ever determine whether or not a user with IP address [REDACTED] ever created an account on the target website? Please provide all relevant documents pertaining to this question.
11. Did the FBI ever determine whether or not a user with IP address [REDACTED] ever created an account on the target website? Please provide all relevant documents pertaining to this question.
12. Did the FLA determine whether or not a user with IP address [REDACTED] ever downloaded and/or uploaded any material to the target website? If so, please provide all relevant documents regarding that determination.
13. Please provide and/or make available for review all material related to the layout of the target website, including, but not limited to, the home page that a viewer would see prior to entering registration information, the pages that would be available to a non-registered user, and the home page that a viewer would see after entering registration information.
14. How did the FBI determine that the target website could only be accessed through knowledge of the URL or through an “index,” as referenced in paragraph 27 of the affidavit in support of the search warrant, as opposed to through a Tor search engine? Please provide all relevant documents pertaining to this question.
15. To what website does paragraph 28 of the application for the search warrant refer? Please provide all information about the website referenced in paragraph 28 that is in the government’s possession, custody, or control including, but not limited to, any documents related to the [REDACTED] referenced in paragraph 28 and any documents and information related to the nature of the content and the name of the website referenced in paragraph 28.
16. Did the FBI have any relevant information related to IP address [REDACTED] and/or Zackary Sanders that is not included in the affidavit in support of the search warrant prior to signing the affidavit in support of the search warrant on February 10, 2020?

Thank you. Please do not hesitate to contact me with any additional questions.

Sincerely,

A handwritten signature in blue ink, appearing to read "E. Voshell", with a stylized flourish at the end.

Emily Voshell